

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
CIVIL ACTION - LAW  
NO: 15-0333

JAMES NACE and APRIL NACE, ) DEPOSITION UPON  
As Guardians of E.N., a  
Minor, ) ORAL EXAMINATION  
Plaintiffs )  
 ) OF  
- VS - )  
 ) ELIZABETH A. NACE  
PENNRIDGE SCHOOL DISTRICT,  
et al., )  
Defendants.. )  
- - - - -

TRANSCRIPT OF DEPOSITION, taken by  
and before Lisa Petitta, RPR, CSR, at the Law  
Offices of DRAKE, HILEMAN & DAVIS, 252 Swamp Road,  
Suite 15, Doylestown, Pennsylvania, on Tuesday,  
July 14, 2015, commencing at 11:00 a.m.

ERSA COURT REPORTERS  
30 South 17th Street  
United Plaza - Suite 1520  
Philadelphia, Pennsylvania 19103  
(215) 564-1233

ORIGINAL

ELIZABETH A. NACE

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A P P E A R A N C E S:

HORNSTINE, PELLONI & HORNSTINE  
BY: DAVID J. GROTH, ESQUIRE  
1500 Walnut Street, Suite 300  
Philadelphia, PA 19102  
Counsel for the Plaintiffs

KELLY, GRIMES, PIETRANGELO & VAKIL, PC  
BY: SEAN KEMETHER, ESQUIRE  
36 East Second Street  
Media, PA 19063  
Counsel for Ryan Clymer & Russell  
Hollenbach

EASTBURN & GRAY, P.C.  
BY: ROBERT M. COX, ESQUIRE  
And ERIN KERNAN, ESQUIRE  
60 East Court Street  
Doylestown, PA 18901  
Counsel for Pennridge School District,  
Jacqueline Rattigan, Thomas Creeden &  
David Babb

DRAKE, HILEMAN & DAVIS  
BY: JONATHAN J. RUSSELL, ESQUIRE  
HENRY THOMPSON, ESQ.  
252 Swamp Road, Suite 15  
P.O. Box 1306  
Doylestown, PA 18901  
Co-Counsel for Faith Christian Academy,  
Ryan Clymer, Ind, and in his official  
capacity as Headmaster of Faith Christian  
Academy and Russell Hollenbach, Ind.,  
and in his official capacity as Athletic  
Director of Faith Christian Academy

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A P P E A R A N C E S:

CASSIDY, CONNOR & PITCHFORD, P.C.

BY: CARLA E. CONNOR, ESQ.

295 East Swedesford Road

Suite 346

Wayne, PA 19087

Co-Counsel for Faith Christian Academy,  
Ryan Clymer, Ind, and in his official  
capacity as Headmaster of Faith Christian  
Academy and Russell Hollenbach, Ind.,  
and in his official capacity as Athletic  
Director of Faith Christian Academy<sup>41</sup>

MARSHALL, DENNEHEY, WARNER, COLEMAN &  
GOGGIN

BY: JOSEPH J. SANTARONE, ESQ.

2000 Market Street

Suite 2300

Philadelphia, PA 19103

Counsel for Faith Christian Academy

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1 (By agreement of counsel, the  
2 sealing and certification are waived;  
3 and all objections, except as to the form  
4 of the question, are reserved until the  
5 time of trial.)

6  
7 ELIZABETH A. NACE, after first  
8 having been duly sworn, was examined  
9 and testified as follows:

10

11 BY MR. KEMETHER:

12 Q. Good morning. I'm Sean Kemether. I'm an  
13 attorney in this case. I represent Ryan Clymer and  
14 Russell Hollenbach in this litigation that you and  
15 your parents have brought. We're here today to  
16 take your deposition. I'm going to assume that you  
17 probably have not been through this process before  
18 in your life. A deposition is a question and  
19 answer session. Let me give you some instructions  
20 that will make the process easier for all of us.  
21 You just took an oath. That's the same oath you  
22 would take in front of a judge or jury even though  
23 we're sitting in a lawyer's office. You are about  
24 to give sworn court testimony. A couple of rules

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1 that are going to help you. One, try to wait for  
2 me to finish my question before you answer, and  
3 I'll try to do likewise. You can probably see, if  
4 not hear, that the court reporter is taking down  
5 everything I'm saying right now, and she does  
6 likewise when you speak or anyone else speaks. So  
7 if one of us speaks at a time, it makes her job  
8 much easier. Two, it's very important that you use  
9 words when answering questions. Sounds obvious,  
10 but in day-to-day life people communicate in ways  
11 other than words. For instance, now you are  
12 shaking your head. You can use your hands. You  
13 can shake your head. You can do all of those  
14 things, but in addition to that you have to say the  
15 words whatever they may be; yes, no, whatever. If  
16 you don't say words, the court reporter cannot take  
17 down anything that you do. She's not going to take  
18 down that you're smiling or shaking your head or  
19 anything like that. We'll try to remind you if  
20 that becomes an issue as we go along. If you don't  
21 know the answer to a question or you can't remember  
22 something, please tell us that. We don't want you  
23 to guess. Tell us what you remember and what you  
24 know. Likely, I'm going to be asking some

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1 questions involving the measurement of at least  
2 time of, for instance, how long ago something  
3 happened. In all likelihood you are not going to  
4 know an exact answer to many of those questions.  
5 You may not know an exact day or exact month, but  
6 if you can give what I call an estimate, a month, a  
7 year, or some approximation at the time without  
8 guessing, I would ask that you try to do that. If  
9 you're pulling numbers out of the sky, that's  
10 guessing. All right. If you need to take a break  
11 for any reason today, including to use the  
12 bathroom, you can make a phone call, or to speak to  
13 your counsel, let us know. We'll make arrangements  
14 for that. We ask if you are answering a question,  
15 answer the question, for instance, then take the  
16 break. All right?

17 A. Okay.

18 Q. Before we get started today, any reason  
19 that you don't feel able to hear and answer my  
20 questions truthfully to the best of your knowledge?  
21 Medication that you've taken? Anything like that?

22 A. No.

23 Q. All right. Let's start then. Give me your  
24 full name?

ELIZABETH A. NACE

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1 A. Elizabeth Anne Nace.

2 Q. Is the Anne with an E?

3 A. Yes.

4 Q. Can you give me your date of birth?

5 A. [REDACTED]

6 Q. So if I'm doing my math correctly, you  
7 turned 18 about almost two months ago?

8 A. Yes.

9 MR. KEMETHER: Off the record.

10 (At this time, a discussion was  
11 held off the record.)

12 BY MR. KEMETHER:

13 Q. Where do you currently live?

14 A. [REDACTED]

15 Q. All right. And approximately how long have  
16 you lived there?

17 A. My whole life.

18 Q. All right. What are your parents' names?

19 A. April and James.

20 Q. I take it they live there as well?

21 A. Yes.

22 Q. Currently does anyone else live there with  
23 you?

24 A. No.



ELIZABETH A. NACE

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- 1 Q. Do you have other siblings?
- 2 A. I have an older sister.
- 3 Q. What is her name?
- 4 A. Amanda.
- 5 Q. Also Nace?
- 6 A. Yes.
- 7 Q. How old is she?
- 8 A. 26.
- 9 Q. Where does she live?
- 10 A. She lives in Hatboro.
- 11 Q. Is she married or single?
- 12 A. She's not married.
- 13 Q. All right. Some questions now about your
- 14 educational background. If I understand correctly,
- 15 within the last few weeks you graduated from high
- 16 school?
- 17 A. Yes.
- 18 Q. We're going to go first to last. We're
- 19 going to go early, then proceed, so we'll start
- 20 with elementary school. Did you go to the same
- 21 elementary school for four years?
- 22 A. Yes.
- 23 Q. Which one was that?
- 24 A. Guth Elementary School.

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10

1 Q. And I missed that.

2 A. Guth, G-U-T-H.

3 Q. And is that part of the Pennridge School  
4 District?

5 A. Yes.

6 Q. Would that have been kindergarten through  
7 fourth grade?

8 A. Fifth grade.

9 Q. Okay. Can you describe for me in your  
10 words, were you a good student, average student,  
11 bad student while in elementary school?

12 A. I was a good student.

13 Q. I don't know how things work today, but do  
14 they have clubs or teams you can join in elementary  
15 school?

16 A. Not really, no.

17 Q. All right. Were there any issues in terms  
18 of missing extended periods of time from elementary  
19 school or having any sort of disciplinary problems  
20 while in elementary school?

21 A. No.

22 Q. Would -- how would you characterize the  
23 experience you had in elementary school?

24 A. It was good. It was a good experience.

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11

1 Q. All right. Next one would be either middle  
2 school or grammar school. Where did you attend  
3 that?

4 A. South Middle School.

5 Q. Is that also in the Pennridge School  
6 District?

7 A. Yes.

8 Q. What grades would that have covered?

9 A. That was sixth through eighth.

10 Q. All right. Again, would you characterize  
11 yourself in those years of middle as being a good  
12 student, average student, or poor student?

13 A. Good student.

14 Q. Did you have any problems with extended  
15 absences or behavioral issues while there?

16 A. No.

17 Q. Grades overall, how were they?

18 A. They were good.

19 Q. And then you went to high school from  
20 grades nine to twelve where?

21 A. At Pennridge High School.

22 Q. I'm going to break high school up a little  
23 bit between the time of your relationship with Mr.  
24 Romig in ninth grade until it started and then

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12

1 during and after. Okay. So let's do this. So  
2 just so we're clear, I understand that you knew Mr.  
3 Romig for a period of time before there was any  
4 sort of a sexual relationship, is that fair?

5 A. Yes.

6 Q. So for the first category I want to talk  
7 about from ninth grade until you first started  
8 having a sexual relationship with him. All right.  
9 Would that take us sometime into the spring of  
10 2013?

11 A. Yes.

12 Q. During that first period of time, so from  
13 ninth grade until the spring of 2013, how were your  
14 grades in high school?

15 A. They were good.

16 Q. All right. A's and B's on average?

17 A. Yes.

18 Q. Were you on any honor rolls or honor  
19 societies during that time?

20 A. Distinguished honor roll.

21 Q. And can you explain for me how one  
22 qualifies for that?

23 A. I believe it's through GPA and your grades  
24 in each class.

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1 Q. And was that true your entire time from  
2 ninth grade until the spring of 2013, you were on  
3 the distinguished honor roll?

4 A. Yes.

5 Q. All right. During the same time period  
6 were you on any athletic teams in the school?

7 A. Softball.

8 Q. Softball. Okay. And that was one where  
9 you would be on the official school team going out  
10 and playing against other schools?

11 A. Yes.

12 Q. Were you on any other teams, sports teams  
13 whether they were interscholastic or  
14 intrascholastic if my terminology is correct?

15 A. No.

16 Q. What was the softball period during the  
17 school year?

18 A. We had tryouts in late February, early  
19 March, I believe.

20 Q. And were you on a team ninth, tenth grade,  
21 and eleventh grade and ultimately twelfth grade?

22 A. Yes.

23 Q. Were there any other clubs or social  
24 organizations that you remember through the school

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1 during this first time period we're talking about?

2 A. I did key club my freshman year, but that's  
3 it.

4 Q. What was that called?

5 A. Key club.

6 Q. You have to fill me in on that.

7 A. It's community service, so you go out and  
8 do projects in the community.

9 Q. During this time period from ninth grade  
10 through the spring of 2013, did you have any issues  
11 with attendance that you were out for any  
12 significant periods of time?

13 A. No.

14 Q. How about with behavioral issues, were you  
15 suspended or anything like that for any period of  
16 time during that time period?

17 A. No.

18 Q. Would you characterize your experience  
19 during that time frame as being good?

20 A. Yes.

21 Q. You enjoyed high school during that time?

22 A. Yes.

23 Q. I'm going to go through and ask similar  
24 type of questions for the time period when you were

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1 having a sexual relationship with Mr. Ronig, which  
2 I understand is somewhere from the spring of 2013  
3 until Octoberish or Septemberish of 2013.

4 A. Yes.

5 Q. During that time frame. Most of that I  
6 understand you were actually not in school, in  
7 other words, it was summertime, but did your grades  
8 suffer during any periods of time those several  
9 months?

10 A. No.

11 Q. Did you remain in the honor program that  
12 you mentioned before?

13 A. Yes.

14 Q. And did you remain playing on the softball  
15 team during the school months?

16 A. Yes.

17 Q. Grades were similar or the same?

18 A. Yes.

19 Q. Attendance issues, did you miss any  
20 significant period of time during that period of  
21 time from when there actually was school to go to?

22 A. No.

23 Q. Any suspensions or behavioral issues during  
24 that time?

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16

1 A. No.

2 Q. Finally, from the time that Mr. Romig was  
3 arrested in October of 2013 until your graduation,  
4 we're going through the same type of thing, how  
5 were your grades during that time?

6 A. In the beginning it was hard for me to like  
7 focus and everything, so they slipped a little bit,  
8 but I was able to bring them back up.

9 Q. Can we characterize the wording of "in the  
10 beginning" of how long a period of time were you  
11 talking?

12 A. It was about a month.

13 Q. It's fair to say by the end of the marking  
14 period you brought the grades back up to where they  
15 normally were?

16 A. Yes.

17 Q. And you mentioned that for about a month it  
18 was hard to concentrate or focus?

19 A. It was longer than a month that it was hard  
20 for me to focus. It was throughout the rest of the  
21 school year.

22 Q. What do you attribute that to?

23 A. It was mentally hard on me, like knowing  
24 that he was arrested and everything, so I couldn't



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1 focus on -- focusing on school work and knowing  
2 that I could like put myself in the situation.

3 Q. I just want to clarify for my  
4 understanding. Hard knowing he was arrested, what  
5 was hard about knowing he was arrested?

6 A. Like it was hard for me because I was put  
7 into that situation, and then going into school,  
8 like the classmates and the people around me, it  
9 was hard being in there and just trying to focus on  
10 school instead of everything that happened  
11 afterwards.

12 Q. What sort of everything are you talking  
13 about?

14 A. I had different problems that occurred  
15 after the arrest, and it was hard for me to sleep  
16 and just be able to be myself again.

17 Q. Okay. Aside from sleeping, what sort of  
18 problems do you think you had during that time  
19 period?

20 A. You could physically see it in my face,  
21 like I had acne and like I broke out a lot, and  
22 then like you could see it in my eyes and just in  
23 my cheeks and everything.

24 Q. Did you lose weight?

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1 A. Yes.

2 Q. Give me a ballpark.

3 A. I was under 100 pounds then because it was  
4 hard for me to eat also.

5 Q. I don't mean to be rude, but approximately  
6 what do you weigh now?

7 A. I weigh 1005.

8 Q. So you lost maybe ten pounds during that  
9 time period?

10 A. Yes.

11 Q. Did you put that weight back on ultimately?

12 A. Yes.

13 Q. How long do you think that took?

14 A. That took the rest of the school year to  
15 get back to normal.

16 Q. So you would not have gone back to playing  
17 -- well, strike that. For the school anyway, you  
18 would not have gone to play softball until the  
19 spring of 2014?

20 A. Yes.

21 Q. That would have been your junior year?

22 A. Yes.

23 Q. You did that?

24 A. Yes.

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1 Q. And was that -- what kind of experience was  
2 that for you?

3 A. It was hard at first being around the  
4 teammates, like just knowing that they knew  
5 everything that happened.

6 Q. How did they know everything that happened?

7 A. It was in the news, and they were able to  
8 figure it out.

9 Q. Did you ever discuss your relationship with  
10 Mr. Romig to any of them?

11 A. No.

12 Q. And talking about your teammates?

13 A. Yes.

14 Q. All right. Did you have a successful  
15 season that spring of your junior year?

16 A. It was all right.

17 Q. It was all right. Was it worse or better  
18 than the one before?

19 A. Record wise it was worse.

20 Q. And do you think that had anything to do  
21 with this incident or did it have something to do  
22 with another factor?

23 A. I feel like it was both.

24 Q. What were the other factors?

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1 A. Just like our team, it was hard for us to  
2 connect and like play together as a team.

3 Q. Did you get -- prior to your senior year,  
4 did you get on any lists for the county? For  
5 instance, I notice that for this season you were on  
6 the Suburban I Continental Allstar Third Team.  
7 Were you ever listed on something like that for any  
8 of your previous years?

9 A. No.

10 Q. All right. I realize this is subjective,  
11 but do you feel your ability to play softball  
12 increased or improved every year?

13 A. Yes.

14 Q. And was that true for your junior year as  
15 well?

16 A. Yes.

17 Q. And when you were a senior, were you better  
18 than when you were a junior?

19 A. Yes.

20 Q. What positions did you play during your  
21 four years?

22 A. In high school I was a pitcher and  
23 outfielder.

24 Q. You mentioned that it took a month or so

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1 for you to get your grades back up after Mr. Romig  
2 was arrested?

3 A. Yes.

4 Q. And did your ability to keep your grades up  
5 continue throughout the rest of high school?

6 A. Yes.

7 Q. And did you remain in the honor society  
8 throughout the rest of high school?

9 A. Yes.

10 Q. Were there any attendance issues, extended  
11 absences during your junior or senior years of high  
12 school?

13 A. When everything first came out, I took a  
14 couple of days off from school, but then I went  
15 back.

16 Q. Other than that, was it fairly normal for  
17 you?

18 A. Yes.

19 Q. And in terms of behavioral issues in your  
20 school during your junior or seniors years,  
21 anything like that where you were suspended or  
22 reprimanded in some way?

23 A. No.

24 Q. I read that it was a dream of yours to play

ELIZABETH A. NACE

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1 college softball, softball in college?  
2 A. Yes.  
3 Q. Did you apply to colleges I assume?  
4 A. Yes.  
5 Q. How many did you apply to?  
6 A. I believe there was three.  
7 Q. Which ones?  
8 A. Kutztown, York, and Lycoming.  
9 Q. All of those are state schools here in  
10 Pennsylvania?  
11 A. Lycoming and York are private schools.  
12 Q. Okay. Were you accepted to all three or  
13 some combination of the three?  
14 A. All three.  
15 Q. And have you decided which one you want to  
16 attend?  
17 A. Yes.  
18 Q. Which one?  
19 A. Lycoming.  
20 Q. And will you be starting sometime next  
21 month there?  
22 A. Yes.  
23 Q. I am not well-versed in Division I, II and  
24 II scholarships. If I understand it, this is a

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1 Division III school?

2 A. Yes.

3 Q. And I don't know if they have athletic  
4 scholarships in Division III schools.

5 A. There are no scholarships for D-III  
6 schools.

7 Q. Any other ways of financial assistance that  
8 one would get if they're going to be playing on the  
9 softball team, for instance, even if it's not  
10 called a scholarship?

11 A. No.

12 Q. Basically you're going to pay your full  
13 freight to go there?

14 A. Yes.

15 Q. Are any friends of yours from the softball  
16 team you played on either in high school or the  
17 Sellersville Belles going to Lycoming with you  
18 this fall?

19 A. No.

20 Q. And have you already met with the softball  
21 coach there and know that you are going to be  
22 playing for the team or do you have to go there and  
23 tryout?

24 A. Tryout.

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24

1 Q. Would that be next spring or sometime  
2 before that?

3 A. I believe next spring.

4 Q. Okay. Do you have a plan as to what you  
5 want to study while at Lycoming?

6 A. I want to major in criminal justice.

7 Q. Okay. Did your relationship, your sexual  
8 relationship with Mr. Romig, figure in any way for  
9 what school you wanted to go to for college?

10 A. No.

11 Q. From the school you are telling me it  
12 sounds like you wanted to stay in state?

13 A. I wanted to go out of state, but my parents  
14 wouldn't let me.

15 Q. I'm familiar with that. Sure. How old  
16 were you when you first met Mr. Romig?

17 A. I was in ninth grade.

18 Q. And in what setting did you meet him?

19 A. Softball.

20 Q. Was he a coach of that team at that time?

21 A. Yes.

22 Q. And what coach was he?

23 A. He was the JV coach.

24 Q. So it sounds like somewhere in the spring



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1 of your freshman year of high school is when you  
2 would have first met him?

3 A. Yes.

4 Q. Was there anything remarkable about your  
5 experience on the girls softball team at Pennridge  
6 your freshman year in terms of your relationship  
7 with Mr. Romig?

8 A. No.

9 Q. Was there any communications beyond  
10 anything having to do with softball with him during  
11 that school year?

12 A. No.

13 Q. And during the summer between your freshman  
14 and sophomore years, would you have had to  
15 communicate with him for any reason?

16 A. No.

17 Q. Would you have to communicate with him at  
18 all until the season for your sophomore year  
19 started?

20 A. No.

21 Q. So I understand you would have played for  
22 him as he being your coach for tenth grade as well?

23 A. Yes.

24 Q. Were you on the JV team both of those

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1 years?

2 A. Yes.

3 Q. Did you also play varsity either of those  
4 years?

5 A. Yes.

6 Q. Both?

7 A. I believe both.

8 Q. Again, anything in terms of the nature of  
9 your relationship with Mr. Romig during your  
10 sophomore year that was beyond softball?

11 A. Towards the end, yes.

12 Q. Can we start with that? Tell me what  
13 started in the beginning -- what happened towards  
14 the end of your sophomore year of playing baseball  
15 or softball that changed the nature of your  
16 relationship from purely softball to something  
17 else?

18 A. He started texting me.

19 Q. As you would imagine, I went to high school  
20 a long time ago. They didn't have cell phones back  
21 then. Is giving ones cell phone number to a coach  
22 a normal thing to do?

23 A. Yes, to get like emails about practices or  
24 things.

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1 Q. So sometime towards the end of your  
2 sophomore season Mr. Romig started texting you?

3 A. Yes.

4 Q. What generally were they about if it was  
5 not about softball?

6 A. He would try to get to know my background  
7 and get to know me more, and then he would start  
8 flattering me and like giving me compliments.

9 Q. Okay. Did he tell you why he was trying to  
10 get to know you better?

11 A. No.

12 Q. And what was your response to that?

13 A. At first I was hesitant.

14 Q. And for how long do you think you were  
15 hesitant?

16 A. Couple of weeks.

17 Q. Did you mention this increased attention to  
18 any of your friends or teammates?

19 A. No.

20 Q. Do you know if he had any type of  
21 relationship beyond softball with any of your  
22 teammates during that time period?

23 A. I do not know.

24 Q. Anyone -- strike that. What happened to

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1 change your feelings from being hesitant to  
2 something else?

3 A. He began to earn my trust, and he got to  
4 know me better like through his flattering and  
5 everything.

6 Q. Okay. Was there anything sexual about his  
7 communications during that time period, that is,  
8 the end of your sophomore year?

9 A. No.

10 Q. Did he continue to communicate with you  
11 over the summer between your sophomore and junior  
12 years?

13 A. Yes.

14 Q. Would that have been via text or some other  
15 way?

16 A. That is when we got together outside of my  
17 house.

18 Q. Okay. Were you -- let me do the math.  
19 What year -- what -- '14/'15, '13/'14, this would  
20 have been '12/'13. This would have been the spring  
21 of 2013?

22 A. Yes.

23 Q. Had you turned 16 while you were playing on  
24 the softball team that spring?

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1 A. Yes, in the middle.

2 Q. Okay. Did the texting start before you  
3 turned 16?

4 A. Yes.

5 Q. How long before you turned 16?

6 A. It was a couple of weeks.

7 Q. At that point, did you tell him how old you  
8 were?

9 A. Yes.

10 Q. Tell me about when did any sort of  
11 communication with Mr. Romig begin to turn sexual  
12 in nature.

13 A. I believe it was in June.

14 Q. Of what year?

15 A. 2013.

16 Q. And do you recall what -- how that started?

17 A. No.

18 Q. Do you recall what happened?

19 A. He started to get to know me better, and he  
20 just built it up as like as time went on.

21 Q. When you say built it up, can you explain  
22 to me what you mean by that?

23 A. Like he went from more innocent to being  
24 more like inappropriate.

ELIZABETH A. NACE

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1 Q. Okay. Did you feel what he was doing in  
2 the spring of 2013 was inappropriate then?

3 A. No.

4 Q. When did you first start to feel that what  
5 he was doing in terms of communicating with you was  
6 inappropriate?

7 A. Months after he was arrested.

8 Q. Okay. We'll get to that in a little bit.  
9 Did he -- did he talk to you about things other  
10 than sex and other than softball?

11 A. Yes.

12 Q. Did you talk back to him about things in  
13 your life other than sex and other than softball?

14 A. Yes.

15 Q. What types of things would you have  
16 communicated with him about, again, we're talking  
17 about the spring of 2013?

18 A. He got to know me, and then he learned  
19 about my eating disorder that I had at the time,  
20 and that's how he built my trust.

21 Q. Okay. How did he learn about your eating  
22 disorder?

23 A. He said he figured it out.

24 Q. Okay. And did he ask you about it?

ELIZABETH A. NACE

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1 A. Yes.

2 Q. Did you then confirm it to him?

3 A. Yes.

4 Q. Tell me about your history of eating  
5 disorder.

6 A. I had it for a couple of years then, and I  
7 had anorexia, so I didn't eat sometimes.

8 Q. Did you ever receive medical treatment for  
9 that?

10 A. No.

11 Q. And from hearing it correctly, it would  
12 have started sometime in high school or eighth  
13 grade, somewhere around there?

14 A. Yes.

15 Q. So you talked to him about your eating  
16 disorder. Did you talk to him about other things  
17 not related to sex and not related to softball in  
18 the spring of 2013? Did you tell him about your  
19 life?

20 A. Yes, family and my background and stuff.

21 Q. Tell me what you recall discussing with him  
22 about your family and your background.

23 A. Just like that I went to church and like my  
24 hobbies and what I did out of school and

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1 everything.

2 Q. In a nutshell what were they?

3 A. I was in Girl Scouts, and I still am, and I  
4 went on mission trips and did church-related  
5 activities and community service.

6 Q. And you mentioned you discussed your  
7 family. What did you discuss about your family?

8 A. Just I had like a sister, and he knew my  
9 mom already, so.

10 Q. Did you discuss anything with him in the  
11 spring of 2013 about the nature of your  
12 relationship with your parents; good, bad,  
13 troubles, no troubles?

14 A. Not really, no.

15 Q. Problems you might have had?

16 A. No.

17 Q. Did that ever come to pass that you would  
18 discuss those topics?

19 A. Yes.

20 Q. Was that later in the relationship?

21 A. Yes.

22 Q. So I understand, what sort of family  
23 problems would you have discussed with him,  
24 whatever the time period?



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1 A. There were really no problems, like I just  
2 told him that I was able to talk to my parents and  
3 that I had a good relationship with them.

4 Q. Did you ever discuss any problems that you  
5 and your parents had --

6 A. No.

7 Q. -- with him. So you mentioned you  
8 discussed your family relationship with him. You  
9 discussed anorexia. Anything else unrelated to sex  
10 or softball?

11 A. No.

12 Q. When he started texting you for the first  
13 month or so, can you give me a ballpark how often  
14 that would take place?

15 A. It was every day. I mean, he texted me  
16 while I was at school, and I wouldn't answer right  
17 away because I couldn't. I was in school.

18 Q. Could you approximate how many texts a day  
19 he would send the first month or so he was texting  
20 you?

21 A. I would say there was only a handful, like  
22 probably around 50.

23 Q. Okay. Over the period of a month or so?

24 A. Yes.

ELIZABETH A. NACE

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1 Q. And did you respond to any of those 50  
2 texts?

3 A. Yes.

4 Q. About how many times?

5 A. Most of the time.

6 Q. All right. Did there come a point then  
7 that the -- was it during this -- was it after --  
8 I'm sorry. Let me put it this way. When did the  
9 texting frequency increase?

10 A. I would say it was early June.

11 Q. Would you have just been ending the school  
12 year around that time?

13 A. A couple of weeks after, yes.

14 Q. Couple weeks after the school year ended,  
15 right?

16 MR. GROTH: I'm not sure you  
17 understood that.

18 MR. KEMETHER: Maybe I didn't.

19 MR. GROTH: You said increased  
20 texting started a couple weeks after  
21 school ended. I think she meant a couple  
22 weeks before.

23 BY MR. KEMETHER:

24 Q. Couple weeks before?

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1 A. Yes.

2 Q. Was the softball team still in its season  
3 at this point?

4 A. It was starting to end.

5 Q. Okay. When the texting frequency  
6 increased, did it pertain to any particular type of  
7 subject?

8 A. Not really, no.

9 Q. Did he ask you to be in a relationship with  
10 him at that point?

11 A. Yes.

12 Q. How did he do that?

13 A. He just said like he didn't want to lose me  
14 over the summer and that he wanted to keep talking  
15 to me because he knew he wouldn't see me.

16 Q. And what was your response to that?

17 A. At first I was hesitant.

18 Q. All right. And from what I understand  
19 reading the Complaint, that changed at some point.  
20 How long were you hesitant?

21 A. I would say about a week.

22 Q. So for that week were you hesitant and  
23 actually just responding to him at all?

24 A. Yes.

ELIZABETH A. NACE

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1 Q. And what happened to change your mind?

2 A. He manipulated me, and he earned my trust.

3 Q. Okay. When you say he manipulated you,  
4 what did he do?

5 A. He kept like saying that he could be there,  
6 and he just earned my trust and kept trying to  
7 build up the relationship.

8 Q. Did you feel what he was doing was  
9 inappropriate at the time he was doing it?

10 A. No.

11 Q. Did that start until -- did that start  
12 after he was arrested?

13 A. Yes.

14 Q. During this increased time of texting, did  
15 he start discussing sex with you?

16 A. After.

17 Q. That he wanted to have sexual relations  
18 with you?

19 A. Yes.

20 Q. After a while, did you respond to any of  
21 those?

22 A. At first, no.

23 Q. Was that for the first week or so?

24 A. Yes.

ELIZABETH A. NACE

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1 Q. After the first week or so, did you respond  
2 to him?

3 A. Yes.

4 Q. How did you respond?

5 A. I was hesitant because I didn't know if I  
6 wanted to at first.

7 Q. Okay. How long a period did -- were you  
8 feeling hesitant about that?

9 A. Probably a couple of weeks.

10 Q. Are we still in June?

11 A. Yes.

12 Q. And did something happen to change your  
13 mind?

14 A. Not really. He just was convinced me.

15 Q. Okay. At any point did you tell him you  
16 did not want to have a sexual relationship with  
17 him?

18 A. In the beginning.

19 Q. And what did he do when you said that?

20 A. He got upset.

21 Q. And can you describe for me how he got  
22 upset?

23 A. He at first he stopped texting me for a  
24 while.

ELIZABETH A. NACE

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1 Q. Okay. What's a while?

2 A. I would say a couple of hours and into the  
3 night, the next day.

4 Q. Okay. So upset was over a period of day or  
5 two?

6 A. Yes.

7 Q. When the texting frequency increased, you  
8 mentioned like 50 time over about a month, describe  
9 how it increased. How many times a day would you  
10 get a text from him in June of 2013 on average?

11 A. I would say about 200, I believe.

12 Q. During that time, would you respond to most  
13 of them?

14 A. Yes.

15 Q. Did you ever initiate texting on your own  
16 to him?

17 A. Not really.

18 Q. No. Was that ever in the relationship or  
19 just during that time period?

20 A. During that time period.

21 Q. All right. Until the time period we're  
22 talking about here, the middle of June of 2013,  
23 were your communications with him exclusively by  
24 text in terms of non-softball matters?

ELIZABETH A. NACE

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1 A. Yes.

2 Q. Were they by email at all?

3 A. No.

4 Q. Were they on the phone?

5 A. No.

6 Q. Or skype or something that you could video  
7 chat or anything like that?

8 A. No.

9 Q. During the course your relationship, is it  
10 fair to say that the majority of ways that you  
11 communicated when you were not in person was via  
12 text?

13 A. Yes.

14 Q. Did you use email during the relationship  
15 to communicate with him?

16 A. No.

17 Q. Ever?

18 A. At the very end when my phone was taken  
19 away.

20 Q. We'll get to that in a little bit. And  
21 when did you first see him outside -- see him in  
22 person outside of the softball coach setting?

23 A. I believe, it was in June.

24 Q. Was it during or after the school year?

ELIZABETH A. NACE

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1 A. It was the very end.

2 Q. So last week or so of the school?

3 A. Yes.

4 Q. Was the team still in session at that  
5 point?

6 A. No.

7 Q. And how did that occur?

8 A. He texted me saying that he wanted to pick  
9 me up and that we should talk and get together.

10 Q. Okay. And how did you respond to that?

11 A. I said okay.

12 Q. And what did you do?

13 A. We went to a local park down the street.

14 Q. Did he pick you up in a car and drive you  
15 there?

16 A. Yes.

17 Q. Where did he pick you up from?

18 A. My house.

19 Q. And were your parents home at this point?

20 A. I do not remember.

21 Q. Until this point in time had you discussed  
22 anything pertaining to Mr. Romig communicating with  
23 you other than softball-related matters to your  
24 parents?



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1 A. No.

2 Q. Had you communicated that topic to any of  
3 your friends?

4 A. No.

5 Q. All right. Let's go back to where you went  
6 to the park for the first time with Mr. Romig.  
7 What happened?

8 A. We just talked.

9 Q. How long do you think you were with him?

10 A. I would say about an hour.

11 Q. In general what did you talk about?

12 A. Just basic things that we talked about over  
13 texts, like background and different things.

14 Q. Anything else happen during that meeting?

15 A. No.

16 Q. Did he drive you home?

17 A. Yes.

18 Q. Did you leave things with him in some way  
19 at that point?

20 A. No.

21 Q. No?

22 A. No.

23 Q. Did you assume you were going to continue  
24 to communicate with him after he dropped you off?

ELIZABETH A. NACE

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- 1 A. Yes.
- 2 Q. Did you?
- 3 A. Yes.
- 4 Q. So the texting continued, did you say, like
- 5 a couple of hundred times a day?
- 6 A. Yes.
- 7 Q. All right. And did this continue through
- 8 the rest of June?
- 9 A. Yes.
- 10 Q. July?
- 11 A. Yes.
- 12 Q. August?
- 13 A. Yes.
- 14 Q. All right. How often did you see him
- 15 during those months of late June, July, August?
- 16 A. I would say a couple of times a week.
- 17 Q. What were you doing that summer? Did you
- 18 have a job or in some other softball program or
- 19 anything like that?
- 20 A. I was on a travel softball team.
- 21 Q. What is the travel softball team?
- 22 A. I was on Deep Run.
- 23 Q. Is that affiliated with the school?
- 24 A. No.

ELIZABETH A. NACE

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1 Q. That's outside of school?  
2 A. Yes.  
3 Q. I've heard something about the Sellersville  
4 Belles. That's a different thing as well?  
5 A. Yes.  
6 Q. Was Mr. Romig affiliated with Deep Run?  
7 A. No.  
8 Q. And how much time during that summer did  
9 that program take?  
10 A. That was about every weekend.  
11 Q. You would go on the road and travel to play  
12 softball tournaments?  
13 A. Yes.  
14 Q. Were any of your teammates from Pennridge  
15 on that team?  
16 A. Yes.  
17 Q. Which ones?  
18 A. There were a couple.  
19 Q. Best of your memory tell me their names.  
20 A. Lisa, Liv, Julia, Natalie.  
21 Q. Full name if you could.  
22 A. Lisa Baumuelier.  
23 Q. Do you know how to spell that one's last  
24 name?

ELIZABETH A. NACE

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1 A. B-A-U-M-U-E-L-L-E-R. Julia Helbling.  
2 Q. H-E-L-B-L-I-N-G?  
3 A. Yes. Liv Campbell and Natalie Babik.  
4 Q. B-A-B-B-I-T-T?  
5 A. B-A-B-I-K.  
6 Q. B-A-B-I-K. I'm sorry.  
7 A. Yes.  
8 Q. Did you discuss your relationship with Mr.  
9 Romig with any of them during the summer of 2013 on  
10 the Deep Run team?  
11 A. No.  
12 Q. During the week how were you spending your  
13 time?  
14 A. For the most part, I was with friends. I  
15 wasn't with him.  
16 Q. And in order to be with him, did you have  
17 to make special arrangements?  
18 A. Yes.  
19 Q. Describe that for me.  
20 A. Like he would pick me up a block away from  
21 my house.  
22 Q. I don't want to assume anything, but if you  
23 were -- back then that summer of 2013, if you were  
24 going somewhere from the house, did you have to

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1 tell your parents where you were going?

2 A. Yes.

3 Q. Did you tell your parents you were going  
4 with Mr. Romig?

5 A. No.

6 Q. What reason did you not tell them that?

7 A. I didn't want them to know.

8 Q. Why didn't you want them to know?

9 A. He told me not to tell anyone.

10 Q. Okay. Did you want to tell your parents?

11 A. Not really.

12 Q. Was there a reason you didn't want to tell  
13 your parents?

14 A. No.

15 Q. Do you think, if you told your parents you  
16 were starting a sexual relationship with Coach  
17 Romig, that they would have had a problem with  
18 that?

19 A. Yes, probably.

20 Q. Did you try to hide that relationship from  
21 your parents?

22 A. Yes.

23 Q. So when you were going to see him during  
24 the summer of 2013, did you have like a stock

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- 1     excuse or did it change all the time?
- 2     A.        I said I was going to a friend's.
- 3     Q.        Who was that friend?
- 4     A.        Alli.
- 5     Q.        A-L-I?
- 6     A.        A-L-L-I.
- 7     Q.        Alli, what's her full name?
- 8     A.        Wedman.
- 9     Q.        Is she still your friend?
- 10    A.        Yes.
- 11    Q.        During the summer -- if you see him a
- 12    couple of times a week, did you have regular days,
- 13    regular time periods, or did it vary?
- 14    A.        It varied.
- 15    Q.        When you would go to see him, was that
- 16    overnight? For a few hours at a time? Can you
- 17    describe that for me?
- 18    A.        Some of them were overnights at his house.
- 19    Q.        All right. How often do you think that
- 20    occurred?
- 21    A.        I would say between 8 and 12 times.
- 22    Q.        All right. And then the other ones were
- 23    they not overnights?
- 24    A.        Yes.

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1 Q. Did you spend overnights anywhere other  
2 than at his house?

3 A. No.

4 Q. Where else would you go if you weren't  
5 going to his house?

6 A. Sometimes we went to different parks or we  
7 walked around.

8 Q. Okay. Did he tell you anything about his  
9 personal life during this time period?

10 A. Yes.

11 Q. What did he tell about his personal life?

12 A. Well, he told me that he wasn't with his  
13 wife anymore, and he didn't really get to see his  
14 kids, and that they were living at, I believe, her  
15 parents' house for the summer.

16 Q. Did he tell you anything about what the  
17 problems were with his wife?

18 A. No.

19 Q. Did you ask him?

20 A. No.

21 Q. Did you ever meet his wife?

22 A. She came to -- we had like a picnic after a  
23 game, I believe, it was my freshman year, so.

24 Q. Is that the only time you ever met her to

ELIZABETH A. NACE

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1 your knowledge?

2 A. Yes.

3 Q. Did you ever meet any of his kids?

4 A. Yes, they came to the picnic too.

5 Q. Other than that picnic, did you ever meet  
6 any of his kids?

7 A. No.

8 Q. Did you go to school with any of his kids?

9 A. No.

10 Q. So tell me about how your relationship  
11 changed from when school ended through the summer  
12 of 2013 with him?

13 A. That was when we started texting more, and  
14 he like got to know me more and my whole background  
15 and everything.

16 Q. Okay. And did he talk about things other  
17 than what we've already discussed? You told me you  
18 mentioned about your eating disorder, family  
19 history. Any other things you were discussing?

20 A. No.

21 Q. Was it during the school year that the  
22 relationship began to be sexual or after the school  
23 year?

24 A. After.



ELIZABETH A. NACE

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1 MR. GROTH: Physically sexual?

2 BY MR. KEMETHER:

3 Q. Physically sexual. I apologize. If I use  
4 the word sex, do you have an understanding of what  
5 that means? I don't want to get into, you know,  
6 part A and part B, but I want to get an idea how  
7 often you were having sex with him in the summer of  
8 2013?

9 A. It was between eight and ten times.

10 Q. Okay. On any of those occasions, did he  
11 ask you to do anything that you didn't want to do?

12 A. No.

13 Q. Did you ever tell him that you didn't want  
14 to engage in sex with him once the relationship  
15 started, the physical relationship?

16 A. No.

17 Q. Do you think that you fell in love with  
18 him?

19 A. Yes.

20 Q. And did you tell him that?

21 A. Yes.

22 Q. Do you think that he fell in love with you?

23 A. I do not know.

24 Q. Did he tell you that he did?

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1 A. Yes.

2 Q. Was the nature of your relationship with  
3 him something that you were happy with during the  
4 summer of 2013?

5 A. Yes.

6 Q. Did that change before your arrest -- his  
7 arrest? I apologize. Sorry about that.

8 A. No.

9 Q. Did he make any promises to you about what  
10 type of relationship that he wanted to have with  
11 you?

12 A. Yes.

13 Q. What sort of promise did he make?

14 A. He said that he wanted to get married later  
15 on.

16 Q. And did you respond to that in some way?

17 A. Yes.

18 Q. What was your response to that?

19 A. At first I didn't want to, like I was  
20 hesitant.

21 Q. And did that change?

22 A. Yes.

23 Q. When did that change?

24 A. I would say it was in July.